

# Exhibit C

**State of California, County of San Francisco**  
**SEARCH WARRANT and AFFIDAVIT**  
**(AFFIDAVIT)**

THE ANNEXED INSTRUMENT IS A  
 CORRECT COPY OF THE ORIGINAL  
 ON FILE IN MY OFFICE.  
 ATTEST: CERTIFIED

DEC 2 12 2017  
 CLERK OF THE COURT  
 Superior Court of California, County of San Francisco  
 By: [Signature] CLERK

I, **Sgt. Alicia Castillo #1999**, swear under oath and penalty of perjury that the facts expressed by this Affidavit and Incorporated Statement of Probable Cause are true and that based thereon he/she has probable cause to believe and does believe that the articles, property, and persons described below are lawfully seizable pursuant to Penal Code Section 1524 et seq., as indicated below, and are now located at the locations set forth below. Wherefore, Affiant requests that this Search Warrant be issued.

[Signature]  
 (Signature of Affiant)

HOBBS SEALING REQUESTED: ☐ YES ☒ NO  
 NIGHT SEARCH REQUESTED: ☐ YES ☒ NO

**(SEARCH WARRANT)**

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICE OFFICER OR PEACE OFFICER IN THE COUNTY OF SAN FRANCISCO; proof by affidavit, under penalty of perjury, having been made before me by **Sgt. Alicia Castillo #1999**, that there is probable cause to believe that the property or person described herein may be found at the location(s) set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524 et seq., as indicated below by ""(s), in that:

- ☐ It was stolen or embezzled – (1524(a)(1) PC);
- ☒ It was used as the means of committing a felony – (1524(a)(2) PC);
- ☒ It is possessed by a person with the intent to use it as a means of committing a public offense or it is possessed by another to whom he or she may have delivered it for the purpose of concealing it or preventing its discovery – (1524(a)(3) PC);
- ☒ It tends to show that a felony has been committed or that a particular person has committed a felony – (1524(a)(4) PC);
- ☒ It tends to show that sexual exploitation of a child, in violation of PC Section 311.3, of possession of matter depicting sexual conduct of a person under the age of 18 years, in violation of section 311.11, has occurred or is occurring – (1524(a)(5) PC);
- ☐ an arrest warrant is outstanding for the person to be seized – (1524(a)(6) PC);
- ☐ a Child Protective Custody Warrant is outstanding for the person to be seized – (1524(a)(6) PC and Family Code 3134.5);
- ☒ a provider of "electronic communication service" or "remote computing service", as defined in Penal code Section 1524.2(a) (including "California corporations" defined as any corporation or other entity that is subject to Section 102 of the Corporations Code and "Foreign corporations" defined as any corporation that is qualified to do business in this state pursuant to Section 2105 of the Corporations Code), has records or evidence regarding a subscriber or customer which (1) is of a type specified in Penal Code Section 1524.3 (i.e. the subscriber/customer's name, address, telephone number or other subscriber number or identity; the types of services the subscriber/customer utilized; the length of time the person has been a subscriber/customer of that service; and the local and long distance telephone toll billing records); and (2) which records or evidence shows that property was stolen or embezzled constituting a misdemeanor, or that property or things are in possession of any person with intent to use them as a means of committing a misdemeanor public offense, or in the possession of another to whom he or she may have delivered them for the purpose of concealing them or preventing their discovery – (1524(a)(7) PC);

SW 40990

You are therefore **COMMANDED** to SEARCH:

**Google Legal Investigations Support**, 1600 Amphitheatre Parkway, Mountain View, CA 94043 .  
 FAX # 650-253-0001,  
[uslawenforcement@google.com](mailto:uslawenforcement@google.com) Attn: Custodian of Records

For the **FOLLOWING PROPERTY or PERSON(s)**:

- All account information, email addresses, passwords, subscriber information, IP logs, methods of payment, communications with others between 01/01/2014 – present date.
- Contents of the Inbox, sent box, all emails between 01/01/14- present date.
- Contents of Google drive and photos between 01/01/14- present date.
- Contents of Google + photos account including, but not limited to, photos stored, sent, and received between 01/01/14- present date.
- Current contents of Google drive account and google photos.

All associated with Google user accounts: [REDACTED]

USRC000173

**CHILD EXPLOITATION; POTENTIAL HARM**

All information obtained through the execution of the warrant that is unrelated to the objective of the warrant shall be sealed and not subject to further review, use, or disclosure without a court order.

Compliance may be made by email to: [alicia.castillo@sfgov.org](mailto:alicia.castillo@sfgov.org) - Email is requested because it tends to be more legible than facsimile. If needed, a contact telephone number is (415)553-7968, or facsimile (415)734-3086.

AND TO SEIZE AND EXAMINE IT / THEM IF FOUND and bring it / them forthwith before me, or this court. This Search Warrant and Affidavit and attached and incorporated Statement of Probable Cause were sworn to as true and subscribed before me on this 11<sup>th</sup> day of December, 2017 at 4:00 A.M. P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

[Signature]  
(Signature of Magistrate)

HOBBS SEALING APPROVED: ☐ YES ☒ NO  
NIGHT SEARCH APPROVED: ☐ YES ☒ NO

Judge of the Superior Court of California, County of San Francisco, Superior Dept # 14

***It is further ordered that Google Inc not notify any person (including the subscriber, customer or owner of the electronic communication or device information to which the materials relate) of the existence of this warrant or this Order of the Court or the existence of the investigation for ninety days unless otherwise directed by the Court.***

[Signature]  
(Signature of Magistrate)

Judge of the Superior Court of California, County of San Francisco, Superior Dept # 14

***Google Inc shall disclose responsive data, if any, by sending to Sergeant Alicia Castillo #1999, San Francisco Police Department, 850 Bryant Street, Room 500, San Francisco, CA 94103 using the US Postal Service or another courier service, notwithstanding 18 U.S.C. 2252A or similar statute or code."***

[Signature]  
(Signature of Magistrate)





STATE OF CALIFORNIA-CITY AND COUNTY OF SAN FRANCISCO  
RETURN TO SEARCH WARRANT

Sergeant Alicia Castillo #1999, being sworn, says that she conducted a search pursuant to the below-described search warrant:

Search Warrant/Case number: 170965489

Issuing Magistrate: Edward Torpoco

Magistrate's Court: Superior Court #14, City and County of San Francisco.

Date of Issuance: 12/11/17. Date of Service: 12/11/17.

and searched the following location (s) , Vehicle (s) , and person (s):

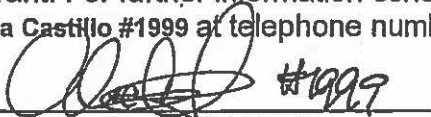
Google *Legal Investigations Support*, 1600 Amphitheatre Parkway, Mountain View, CA 94043 . FAX # 650-253-0001,  
[uslawenforcement@google.com](mailto:uslawenforcement@google.com) - Attn: Custodian of Records

and seized the following items:

All account/ subscriber information for Google user account:

I further swear that this is a true and detailed account of all the property taken by me pursuant to the search warrant and that pursuant to Penal Code Sections 1528 and 1536 this property will be retained in my custody, subject to the order of this court or of any other court in which the offense in respect to which the seized property is triable.

Be advised that pursuant to California Penal Code Sections 1539 and 1540, you may file a written motion in the court of the above-named magistrate who issued the search warrant, seeking the return of the property seized pursuant to this warrant. For further information concerning this search warrant contact Sergeant Alicia Castillo #1999 at telephone number 415.553-7968.

  
(Signature of Affiant)

Sworn to and subscribed before me this 21st day of DEC 2017.

  
(Signature of Magistrate)

Judge of the Superior Court, City and County of San Francisco, State of California



## STATEMENT OF PROBABLE CAUSE

My name is Alicia Castillo. I am currently employed as a police officer in and for the City and County of San Francisco, California. I have been so employed for over 15 years. I am currently assigned to the Investigations Bureau as an Inspector in the Special Victims Unit. My previous assignments include Inspector / Sergeant for the Park, Tenderloin and Mission Station Investigative Teams.

In my current assignment, my primary responsibility is to investigate allegations of child physical and sexual abuse and internet crimes against children. In connection with my duties and responsibilities as a law enforcement officer, I have also testified in state and federal judicial proceedings.

During my career, I have investigated and/or have been involved in the investigation of over a hundred domestic violence and child abuse cases. I have conducted interviews of victims and witnesses of domestic violence, sexual assault and child abuse.

I have received formal training at the San Francisco Police Academy in, and am familiar with, the investigation, processing of evidence, and identification techniques associated with domestic violence, sexual assault, and child physical and sexual abuse. In addition to the San Francisco Police Academy, I have completed the following:

- B.S. Business Administration and Communications – NDNU 1999
- Advanced Certificate Peace Officer Standards and Training Certificate
- Robert Presley Institute of Criminal Investigation (ICI) Course, 80 hour (POST)
- Search Warrant and Arrest Course (POST)
- Field Training Officer Course (POST)
- Hotel/Motel Enforcement Course (CNOA)
- Chasing Phones (CNOA)
- 11550 H&S Drug Influence Course (POST)
- Robbery Apprehension Team Basic Course (SFPD)
- Robbery Apprehension Team Advanced Course (SFPD)
- Reid Technique of Interviewing and Interrogation (DEA)
- Electronic Surveillance (Wiretap) Training Course (HIDTA)
- Instructor Development Course (POST)

On 11/30/17, I was assigned SFPD CASE #170-965-489, CyberTip #25390444 that was reported by the National Center for Missing and Exploited Children (NCMEC) by Tumblr.

Tumblr (stylized on its home page as **tumblr.**) is a microblogging and social networking website founded by David Karp in 2007, and owned by Yahoo! since





2013. The service allows users to post multimedia and other content to a short-form blog. Users can follow other users' blogs. Bloggers can also make their blogs private. For bloggers, many of the website's features are accessed from a "dashboard" interface.

Tumblr reported the following:

On 11/08/17 at 21:12:00 UTC a Tumblr with the user name **chaz2076** with the IP Address of **162.238.124.187** utilizing the email of [REDACTED] uploaded the filename: **78180748604.jpg** to their Tumblr blog address of **chaz2076.tumblr.com** in early part of 2014, beginning in February.

I reviewed the image (filename: **78180748604.jpg**) and it is described as follows:

The image is of a fully nude female child between the approximate ages of 9-12. The female child is sitting upright on her buttocks with her legs spread exposing her breasts and vagina to the camera while her left hand rests behind her head and her right hand is on the ground supporting her seated position. The photograph appears to have been taken in an undisclosed, outside wooded area.

I conducted an online search for **chaz2076.tumblr.com** and discovered several archived images of nude underage teenage males exposing their genitals that appeared to have been uploaded to Tumblr by **chaz206** to another Tumblr user's blog in 2014.

**AFFIANT** based on training and experience and the information supplied in the affidavit, is of the opinion that the items described are currently located at the above premises.

**AFFIANT** based on training and experience and the information supplied in the affidavit, is of the opinion that a complete search and disclosure of the target's Google account **rxcofield@gmail.com** pursuant to this search warrant will assist in the identification of children who are being sexually exploited through child molestation, child pornography, and/or child prostitution. The materials may also aid in the identification of other adults who are engaging in the sexual exploitation of children by these means. In addition, these materials will demonstrate the sexual proclivity, inclination, preference, and activities of the person under investigation, providing evidence that will tend to show that the person under investigation has committed a felony, to wit: **311.11(a)-Possession of Child Pornography**.

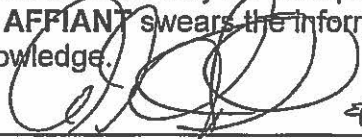
Based on my training and experience I believe if any notification is given to the target, and the target is the primary suspect, it will lead to the destruction of any and all evidence to deter law enforcement.



Pursuant to the delayed notice provisions of Penal Code §1546.2(b), an order is further requested, delaying any notification to the target about this warrant, for a period of ninety days. Providing prior notice to the target in this matter may have an adverse result such as endangering the life or physical safety of an individual, lead to flight from prosecution, lead to destruction of or tampering with evidence, lead to intimidation of potential witnesses, or otherwise seriously jeopardize the investigation


All information obtained through the execution of the warrant that is unrelated to the objective of the warrant shall be sealed and not subject to further review, use, or disclosure without a court order.

AFFIANT states and declares that she has disclosed and provided the Office of the District Attorney as a part of this application for this search warrant and the Court reviewing this affidavit, all known material facts, whether favorable or unfavorable to either side, including all information which may be exculpatory, and that said information is contained herein. AFFIANT swears the information in this document to be true to the best of her knowledge.

  
(Signature of the Affiant)

Sworn to as true and subscribed before me

On 11<sup>th</sup> day of December 2017, at 4:19 A.M. / P.M.

  
\_\_\_\_\_  
Judge of the Superior Court  
County of San Francisco, State of California

